

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. et al.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

JUDGE CHRISTOPHER A. BOYKO

STIPULATED MOTION TO EXTEND EXPERT DISCOVERY DEADLINE

Plaintiff James Hayden (“Hayden”) and Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, “Take-Two”) have agreed and stipulated to extend the expert discovery deadline from its current date, August 26, 2021, to August 30, 2021, and thus jointly ask the Court to modify the deadline set forth in its April 29, 2021 Order accordingly.

The good cause for this short extension request is that, due to scheduling issues, the parties were unable to schedule all of the expert depositions by the current deadline. This motion is not made for the purpose of delay but to allow four additional days for the parties to complete expert depositions and will have no other effect on the case schedule.

Respectfully submitted,

DATED: August 5, 2021

/s/ Miranda Means

Dale M. Cendali (admitted *pro hac vice*)
Joshua L. Simmons (admitted *pro hac vice*)
Miranda Means (admitted *pro hac vice*)
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
dale.cendali@kirkland.com
joshua.simmons@kirkland.com
miranda.means@kirkland.com

Matthew J. Cavanagh (OH 0079522)
McDonald Hopkins LLC
600 Superior Avenue, East, Ste. 2100
Cleveland, Ohio 44114
Telephone: 216.348.5400
Fax: 216.348.5474
mcavanagh@mcdonaldhopkins.com

*Attorneys for Defendants 2K Games, Inc.
and Take-Two Interactive Software, Inc.*

/s/ Andrew Alexander

Daniel McMullen (Ohio Bar No. 0034380)
Andrew Alexander (Ohio Bar No. 0091167)
CALFEE, HALTER & GRISWOLD LLP
The Calfee Building
1405 East Sixth Street
Cleveland, Ohio 44114-1607
Telephone: (216) 622-8200
Facsimile: (216) 241-0816
dmcmullen@calfee.com
aalexander@calfee.com

Of Counsel

Kimberly A. Pinter (Ohio Bar No. 0084277)
CALFEE, HALTER & GRISWOLD LLP
The Calfee Building
1405 East Sixth Street
Cleveland, Ohio 44114-1607
Telephone: (216) 622-8200
Facsimile: (216) 241-0816
E-mail: kpinter@calfee.com

Attorneys for Plaintiff James Hayden

CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2021, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing to all counsel of record, all of whom are registered ECF participants.

/s/ Andrew Alexander

Andrew Alexander

Attorney for Plaintiff